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 DEPOSITION OF ROBERT A. WHITE, JR.  
 CONDUCTED ON TUESDAY, FEBRUARY 14, 2012

31 (Pages 121 to 124)

<p>121</p> <p>1 of the job conditions, how do you think those killed      2 Mr. Halferty?</p> <p>3 MR. GARLAND: Objection.</p> <p>4 A The job site, if the conditions would have      5 been the way they were supposed to, I could have used      6 the forks, picked the beam up, set it up there and set      7 it on there. But it wasn't, so I used the strap to      8 jockey the beam in, to get it up there into place.</p> <p>9 BY MR. MAHAFFEY:</p> <p>10 Q So do you think the job conditions caused      11 the strap to break?</p> <p>12 A Overall, yeah, because the strap wouldn't      13 have been used if it wouldn't have been for the job      14 conditions.</p> <p>15 Q What else would you have used?</p> <p>16 A The forks.</p> <p>17 Q You would have used the forklift?</p> <p>18 A Yeah, used the forklift, the forks on the      19 forklift to set it up there.</p> <p>20 Q Why do you think the strap failed?</p> <p>21 A I have no idea.</p> <p>22 Q Do you think if you'd used another strap</p>	<p>123</p> <p>1 Q So the reason that you don't use new straps      2 all the time is because you want to save money?</p> <p>3 MR. BURGOYNE: Objection.</p> <p>4 A The reason is it's not a call to use a new      5 strap every time.</p> <p>6 BY MR. MAHAFFEY:</p> <p>7 Q Because it's too expensive?</p> <p>8 A There's no call for it. If the strap is      9 good, why would you buy a new one? Why would you buy      10 a new phone if your phone still worked?</p> <p>11 Q Do you think you should have used padding on      12 this job site?</p> <p>13 A From what I understand now, yeah, it might      14 have helped.</p> <p>15 Q Okay. Who do you think was the last person      16 who could have prevented the accident?</p> <p>17 A Me.</p> <p>18 Q Did the death of Mr. Halferty have an impact      19 on the overall job in terms of stopping it?</p> <p>20 A I -- honestly, I don't know why it would      21 have, but I was not going to go -- continue on with      22 it.</p>
<p>122</p> <p>1 that Mr. Halferty wouldn't have died?</p> <p>2 A I honestly have no idea.</p> <p>3 Q What's your guess?</p> <p>4 MR. BURGOYNE: Objection.</p> <p>5 A I've used straps many times over many years,      6 and that's the first time I had one break.</p> <p>7 BY MR. MAHAFFEY:</p> <p>8 Q Do you think you should have had a new one,      9 brand-new one?</p> <p>10 A That was almost new.</p> <p>11 Q Well, you said that you'd used it before.</p> <p>12 A Yeah, but it was almost new. I mean, you      13 can't -- you can't go out and buy a strap for every      14 job you do. The job, it just don't pay enough, it's      15 not -- I don't know what you call it.</p> <p>16 Q But isn't a strap only 60 bucks?</p> <p>17 A No, it should -- if you buy one every job,      18 everything leads up. There ain't no money building      19 canopies anymore. That's one reason I'm not doing it,      20 too.</p> <p>21 Q Because you're not making enough money?</p> <p>22 A You're not making money.</p>	<p>124</p> <p>1 Q Okay. So that would necessitate getting      2 somebody else to do your job, right?</p> <p>3 A Yes.</p> <p>4 Q Okay. So then after, when Mr. Halferty      5 died, did there come a point where you gave a      6 statement to anybody about what happened?</p> <p>7 A I'm sure I did.</p> <p>8 Q Do you remember?</p> <p>9 A No.</p> <p>10 Q Okay. Do you remember talking to the Navy      11 people?</p> <p>12 A I know I did. And I talked to the police      13 and talked to OSHA, but I don't remember what I said,      14 or what they were asking, or --</p> <p>15 Q Okay. Do you remember when you talked to      16 the Navy?</p> <p>17 A I know that day or that night I talked to a      18 couple different people. Then the next day I talked      19 to some other ones.</p> <p>20 Q Who did you talk to the next day?</p> <p>21 A Like I said, I don't -- it might have been      22 the Navy the next day. OSHA was the next day.</p>